

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

CHARLES HADDAD,

Plaintiff,

v.

Case No: 2:04CV74932

The Honorable Anna Diggs Taylor

Magistrate Judge Donald A. Scheer

INDIANA PACERS, an assumed name, a/k/a
PACERS BASKETBALL CORPORATION, an
Indiana corporation, JERMAINE O'NEIL and
ANTHONY JOHNSON, Jointly and Severally.

Defendants.

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**DEFENDANT ANTHONY JOHNSON'S
PRELIMINARY EXHIBIT LIST**

Defendant Anthony Johnson (“Johnson”), by and through his attorneys Miller Canfield Paddock and Stone, P.L.C., lists the following preliminary exhibits. Defendant reserves his right to amend and/or supplement this list after the completion of discovery:

1. Medical records of Johnson including X-rays of Johnson related to Johnson’s hand injury.
2. Any and all video recordings of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers, including all video recordings of the events giving rise to this dispute and of Johnson’s involvement in the events giving rise to this dispute.
3. Any and all documents maintained by the Palace of Auburn Hills with respect to Plaintiff’s behavioral problems at Palace events.
4. The police report generated by the Auburn Hills Police Department.
5. Any and all documents maintained by the Palace of Auburn Hills that in any way relate or refer to Plaintiff and/or the events occurring at the conclusion of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers.
6. Any and all documents reviewed and/or relied upon by the Oakland County Prosecutor’s Office in connection with the investigation of the events occurring at the conclusion of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers.
7. Any and all witness statements describing the events occurring at the conclusion of the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers.
8. Any exhibits identified or offered in the parallel criminal proceedings, as well as all court transcripts.
9. Any exhibits identified or offered by any other party.
10. The parties’ responses to written discovery requests.

11. Any exhibits identified or submitted in depositions after this Exhibit List is submitted to the Court.
12. All depositions and exhibits to depositions.
13. All documents produced by non-parties through discovery, including documents produced from subpoenas.
14. Any and all expert witness reports, files, notes and other documents.
15. Any documentary evidence necessary for rebuttal or impeachment.
16. Demonstrative and/or summary exhibits.
17. Johnson reserves the right to amend or supplement this list as additional information becomes known during discovery or otherwise.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: /s/ Hideaki Sano

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Dated: August 3, 2006

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2006, I electronically filed:
Defendant Anthony Johnson's Preliminary Exhibit List and this Certificate of Service with the
Clerk of the Court using the ECF system which will send notification of such filing to:

Lawrence S. Charfoos, lcharfoos@c2law.com,
Brian M. Akkashian, bakkashian@dickinsonwright.com;
Steven M. Potter, spotter@potterlaw.com;

I certify that I have mailed by United States Postal Service the papers to the following non-ECF participants: (none).

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